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Refer to: L1190400007 -- Madison County
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Superfund/Technical Reports

December 16, 1988

Mr. Brad Bradley, 5HS-11
Project Manager
USEPA-Region V
230 South Dearborn
Chicago, Illinois 60604

RECEIVED
DEC 19 1988
REMEDIAL & ENFORCEMENT
RESPONSE BRANCH

Dear Mr. Bradley:

The purpose of this letter is to summarize activities related to review and finalization of NL's September 1988 RI report and to propose an addendum to the report.

After the report was received by IEPA on September 27, 1988 we reviewed it and provided comments to USEPA dated October 19, 1988. In the transmittal letter I stated that the IEPA would approve the RI provided that USEPA prepare an addendum to the report and incorporate the IEPA comments.

On October 27 you informed me that you would not be able to complete the addendum by the deadline of November 3 so I agreed to prepare the addendum. I included in the addendum the IEPA comments as well as USEPA comments from your September 7, 1988 letter and telefaxed it to you on November 2. On the same date you informed me that we could not approve the RI and add an addendum but rather we had to send a letter noting the necessary changes to the RI per paragraph 17 of the Consent Order. We agreed that you and Dave Dolan would review and comment on the addendum so that it could be finalized. However, on November 3 you informed me that you and Dave had decided to provide a more general letter to NL and state that all three risk assessment approaches used in the RI should be removed. You also informed me of the other necessary changes to be included in the letter. I questioned why the soil lead -- blood lead correlation should be removed and why the arsenic calculations of IEPA's comments were not included. USEPA's letter was sent on November 4 which did not allow IEPA adequate time to review for consistency with our comments. Subsequent review indicates that the letter is not acceptable to the IEPA. As is indicated in our comments the entire risk assessment should not be removed but rather only the "ADI approach" which was used for lead. In addition other IEPA comments were not included.



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At a meeting between NL, USEPA and IEPA on December 8 it was agreed that the September, 1988 RI can be approved upon the condition of an addendum to address Agency disagreements with the report.

The IEPA believes that the attached addendum contains all IEPA and USEPA concerns and should be attached to the RI approval letter. Please provide a timely response so that the addendum can be finalized and delays in the RI/FS schedule minimized.

Sincerely,

A handwritten signature in cursive script, reading "Kenneth M. Miller".

Kenneth M. Miller, Project Manager
Federal Site Management Unit
Remedial Project Management Section
Division of Land Pollution Control

KMM:dks/3924j, 20-21

cc: Terry Ayers
Gary King
Connie Sullinger
Division File
Dave Dolan